

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA	:	
Plaintiff	:	
	:	
v.	:	
	:	INDICTMENT NO. 1:00-CR-260-4-WBH
	:	
WILLIAM J. PLEMONS, JR.,	:	
Defendant	:	

WILLIAM J. PLEMONS'S RESPONSE TO RESTITUTION

William Plemons proposes the following order of restitution:

The total restitution that is owed in this case is \$1,100,000 and is owed to the following person(s) in the following amounts:

<u>Names of Payee</u>	<u>Amount of Restitution</u>
Fireman's Fund Ryan Russell 777 San Marin Drive Novato, California 94998	\$696,214.26
American International Group, Inc. d/b/a Granite States Attn: Joe Cooker 2550 Northwinds Parkway, 5th Floor Alpharetta, GA 30004	360,572.96
Liberty Mutual Insurance Company Legal Department Attn: Sean McSweeney 175 Berkeley Street Boston, MA 02117	8,112.49
National American Attn: Pat Gilmore P.O. Box 9 Chandler, OK 74834	35,100.29

The Court found it appropriate to apportion the restitution and made Defendant William Plemons jointly and severally liable with Defendant Russell Smith for \$400,000 of the total restitution amount. The Court has been informed that Plemons has paid \$200,000 and concluded a settlement with Fireman's Fund. The Court will not order Plemons to pay any monthly restitution until he is released. Upon his release he will pay \$100 per month.

Respectfully submitted this 21st day of March, 2005.

Maloy and Jenkins
25th Floor
75 Fourteenth Street, NW
Atlanta, GA 30309
404-875-2700

/s/ Bruce Maloy

BRUCE MALOY

Georgia Bar No. 468525

Counsel for William J. Plemons, Jr.

CERTIFICATE OF SERVICE

This is to certify that I have served a copy of the foregoing William J. Plemons's Response to Restitution upon the following party by U.S. mail, postage prepaid.

Barbara E. Nelan
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Atlanta, GA 30305

This 21st day of March, 2005.

/s/ Bruce Maloy
BRUCE MALOY